

**Hearing Date: October 18, 2010**  
**Hearing Time: 10:00 a.m.**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: Case No. 09-22525 (RDD)  
RICHARDS CONDITIONING CORP., :  
:   
Debtor. :  
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**NOTICE OF MOTION OF PLUMBERS AND PIPEFITTERS  
NATIONAL PENSION FUND AND INTERNATIONAL TRAINING FUND  
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSES**

**PLEASE TAKE NOTICE** that, upon the motion dated September 15, 2010 of the Plumbers and Pipefitters National Pension Fund (the “PPNPF”) and International Training Fund (the “ITF”) (collectively, the “Funds”) and the accompanying Declaration of William T. Sweeney, Jr., the Funds will move this Court, by their undersigned attorneys, before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court, 300 Quaroppas Street, White Plains, New York 10601, on the 18th day of October 2010, at 10:00 a.m., or as soon thereafter as counsel may be heard, for an order pursuant to sections 105, 503, and 507 of Title 11 of the United States Code, Rules 9013 and 9014 of the Federal Rules of Bankruptcy Procedure, and Local Rule 9013-1 of the Local Rules of Bankruptcy Procedure, authorizing and compelling debtor Richards Conditioning Corp. (the “Debtor”) to pay \$13,465.66 in contributions to the PPNPF and \$1,239.02 in contributions to the ITF, plus interest, liquidated damages, and attorneys’ fees, as administrative expenses in connection with postpetition work performed by the Debtor’s employees, and for such other and further relief as may be just and proper under the circumstances.

**PLEASE TAKE FURTHER NOTICE** that responsive papers, if any, must be filed with the Court on its website, [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) (Login and Password required), with a copy delivered directly to Chambers, and served and received by the undersigned counsel for the Funds, and all parties having filed a notice of appearance, no later than seven days prior to the hearing date.

Dated: New York, New York  
September 15, 2010

VIRGINIA & AMBINDER, LLP

By: /s/ Marc A. Tenenbaum  
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